

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

H. CRISTINA CHEN-OSTER; LISA PARISI;
AND SHANNA ORLICH,

Plaintiffs,

v.

GOLDMAN, SACHS & CO. and THE
GOLDMAN SACHS GROUP, INC.,

Defendants.

10 Civ. 6950 (AT) (JCF)

DECLARATION OF KIRSTINE WILSON

I, Kirstine Wilson, hereby declare under penalty of perjury that the following is true and correct:

1. I am employed by Goldman, Sachs & Co. ("Goldman Sachs" or the "Firm") as the Head of Talent Acquisition for the Securities Division as part of the Experienced Hire Recruiting Group ("Recruiting") in the Human Capital Management Division ("HCM"). I have been with Goldman Sachs for ten years, and am located in New York City. This declaration is based on my personal knowledge of hiring practices, and I would be competent to testify to the following facts if called upon to do so. I am providing this declaration voluntarily and of my own free will.

2. Currently, I work as part of the team that partners with Business Units and Securities Division leadership to fulfill their hiring needs. The professionals that are hired from other firms are known as "lateral" or "experienced" hires, as distinguished from our "campus" or "direct" hires, whom we hire directly from college or graduate programs. Our campus or direct hires are recruited under different processes from our lateral hires.

3. While the process varies somewhat for each individual hired, most hiring searches for laterals follow broadly similar paths. A Business Unit may seek out a lateral hire for any number of reasons, including: (1) the Business Unit is seeking to grow market share via strategic talent acquisition; (2) developing new business; (3) the Business Unit requires an individual with a specialized skillset that it has not been identified internally; or (4) is seeking to replace an individual lost through attrition.

4. As part of the hiring process for lateral hires, my group helps the Business Unit to identify and recruit individuals in the market who might be a good fit for the business's needs and to determine an appropriate compensation amount to offer potential hires. Often, the Firm has identified individuals who are among the most skilled—and highly compensated—at their current firms.

5. As part of the hiring process, my group uses a variety of tools to estimate or determine a recruit's current compensation package, as well as the revenue that the recruit has generated for his or her current firm. Individuals at the VP level, for example, often will have specific revenues tied to their performance; we gather and compile that information and present it to the hiring managers to help them determine the compensation that should be offered to lateral recruits to induce them to join Goldman Sachs.

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] These inducements were typical in the financial industry, and were expected by prospective lateral hires in order for Goldman Sachs to compete with other competitors in the industry.

7. In this time period, the Firm had to compete with not only other large financial services firms, but also with hedge funds and private equity funds that are not publically traded and therefore have a greater ability to pay above market compensation. A large number of prospective lateral hires, as well as Goldman Sachs employees, chose to work at such firms instead of the Firm. [REDACTED]

8. [REDACTED]

[REDACTED] This is because we often recruit and hire highly sought-after individuals who are have generated substantial profits for their firms and are considered at the top of their sectors.

9. The need to compete for lateral hires and induce them to leave lucrative positions, often in highly desirable business areas, is not an issue for our campus or direct hires. The recruitment and hiring process—and the types of packages offered to lateral hires—is therefore completely different from the process for recruiting direct hires. [REDACTED]

[REDACTED] We generally do not consider the two types of hires to be comparable from a recruiting or compensation package perspective because of the different market factors involved.

I declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: New York, New York
June 30, 2014

Kirstine Wilson
Kirstine Wilson